

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SOUTH AFRICAN BUNKERING AND TRADING LTD; §

VS.

Labpro Pharma LLC

MSBE Ventures Inc

Defendants

And

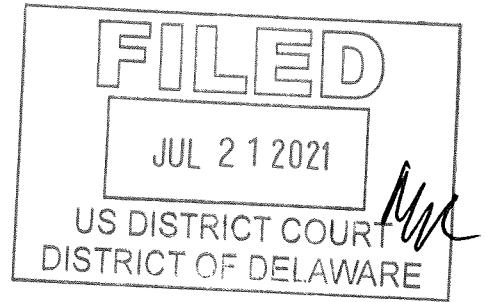
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CIVIL ACTION 21-866(UNA)

IN ADMIRALTY, Rule 9(h)



***DEFENDANT'S VERIFIED ANSWER TO MOTION TO STRIKE OFF VERIFIED
ANSWER TO PROCESS OF MARITIME ATTACHMENT AND GARNISHMENT***

NOW comes, the Defendants LabPro Pharma LLC, and MSBE Ventures Inc and makes this limited appearance or special appearance to Plaintiff's South African Bunkering and Trading Ltd. (SABT) *quasi in rem* action pursuant to Supplemental Rule B for Certain Admiralty and Maritime Claims, requesting the issue of writs of maritime attachment and garnishment including against Garnishees and States as Follows:

I.

Plaintiff is working very hard to avoid due process and silence the voice of the defendant to be heard by a court of law in the United States of America prior to judgement. The law allows each party to be heard so that the judge can adjudicate in a fair manner.

II.

The court should vacate plaintiff request to strike the verified answer of the defendant and schedule a hearing for the defendant to have the opportunity to present the facts as known to

the defendant. Worthy of note is the fact that no attempt at mediation has been done and plaintiff has categorically refused to talk about the matter because the desire to get a court judgment is the only motive here.

Further, if the court agrees that an attorney for the defendant is a *conditio sine qua non* to entering an appearance in this matter, the defendant prays that the court allows it sufficient time to retain the services of an attorney experienced in this matter to enter appearance.

PRAAYER

WHEREFORE, Defendant prays the verified answer be entered into the proceedings and a date be set for trial. That the motion to strike the defendant's verified answer be ignored and due process be upheld.

Respectfully Submitted



Dr. Moise Arrah
Defendant.

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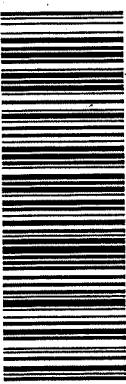
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